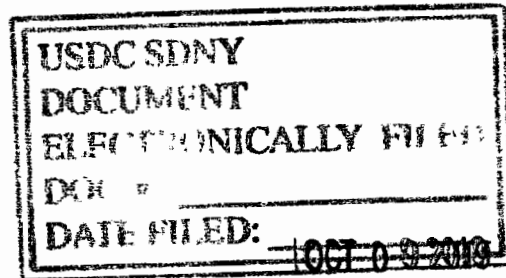




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October 9, 2019

VIA ECF

Hon. George B. Daniels
United States District Court, Southern District of New York
500 Pearl St.
New York, NY 10007

**Re: *Lelchook, et al. v. Lebanese Canadian Bank SAL, et al.*, Case Number 18-cv-12401
(GBD) (S.D.N.Y.)**

Dear Judge Daniels:

This law firm represents Defendants Lebanese Canadian Bank SAL ("LCB") and Mohamad (sued as "Mohamed") Hamdoun ("Mr. Hamdoun") in the above-referenced action. On behalf of LCB, Mr. Hamdoun, and the Plaintiffs, we write to request that this action, which is stayed pursuant to the Stipulation and Order so-ordered by Your Honor on April 16, 2019 (the "Stipulation") (ECF No. 32), remain stayed pending resolution of the appeal of this Court's September 20, 2019 Memorandum Decision and Order (the "*Kaplan* Order") in *Licci (Kaplan), et al. v. Lebanese Canadian Bank, SAL*, 08-cv-7253 (GBD) (S.D.N.Y.) ("*Kaplan*").

By the Stipulation, LCB, Mr. Hamdoun, and the Plaintiffs agreed, and this Court so ordered, that this case should be stayed "until sixty (60) days after entry of an order of this Court granting or denying [LCB's] motion to dismiss" in *Kaplan* "in the interests of judicial efficiency," given that the claims in this case and the *Kaplan* case arise out of the same alleged conduct by LCB and the same rocket attacks allegedly committed by Hezbollah in July and August 2006. (ECF No. 32, ¶ 2). On September 20, 2019, this Court issued the *Kaplan* Order granting LCB's motion to dismiss that action. *See Kaplan*, Case No. 08-cv-7253 (GBD) (S.D.N.Y.), ECF No. 113.

LCB intends to argue in its motion to dismiss this case that the *Kaplan* Order has preclusive, and at a minimum persuasive, effect warranting dismissal of the Plaintiffs' claims here. However, counsel for the *Kaplan* Plaintiffs (who are also counsel to the Plaintiffs in this action) have advised us that they will appeal the *Kaplan* Order. We have conferred with Plaintiffs' counsel and agreed that, just as the "interests of judicial efficiency" weighed in favor of staying this action pending this Court's *Kaplan* Order, they also militate in favor of a continued stay pending resolution on appeal of the *Kaplan* Order.

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VIA ECF

Hon. George B. Daniels
United States District Court
Southern District of New York
October 9, 2019

Accordingly, on behalf of LCB, Mr. Hamdoun, and the Plaintiffs, we respectfully request that this Court order that this action shall remain stayed in its entirety, including but not limited to the time of LCB and Mr. Hamdoun to answer, move to dismiss, or otherwise respond to the Complaint in this action, until sixty (60) days after final resolution on appeal of the *Kaplan* Order.

Respectfully submitted,

Squire Patton Boggs (US) LLP

/s/ Gassan A. Baloul
Gassan A. Baloul

cc: All counsel of record (via ECF)

OCT 09 2019



SO ORDERED.

HON. GEORGE B. DANIELS